

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FIRST GUARANTY MORTGAGE
CORPORATION, *et al.*,¹

Liquidating Debtors.

Chapter 11

Case No. 22-10584 (CTG)

(Jointly Administered)

Re: D.I. 988, 998, & 1017

**THE PIMCO PARTIES' EXHIBIT LIST FOR THE NOVEMBER 2, 2023
HEARING ON THEIR MOTION FOR CONTEMPT**

Pacific Investment Management Company LLC and PIMCO Investments LLC (collectively, the “PIMCO Parties”) hereby submit this exhibit list (this “Exhibit List”) for the hearing scheduled for November 2, 2023 at 1:00 p.m. (prevailing Eastern time) on the *Motion of the PIMCO Parties for Contempt for Violation of the Court’s Enforcement Order and Confirmation Order* [D. I. 988] (the “Motion for Contempt”), all of which were publicly filed on the docket of the Qui Tam Litigation captioned *United States ex rel. Crutcher v. First Guaranty Mortgage Corporation*, No. 1:16-cv-3812 (N.D. Ga. Oct. 13, 2016) or on the docket in these chapter 11 cases.

The PIMCO Parties reserve the right to introduce one or more, or none, of the exhibits listed below, and further reserve the right to supplement this list at any time prior to the hearing. The PIMCO Parties reserve the right to offer into evidence any exhibit necessary to rebut any evidence offered by any other party including any exhibits used by another party.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s tax identification number in the jurisdiction were: First Guaranty Mortgage Corporation (“FGMC”) (9575); and Maverick II Holdings, LLC (“Maverick”) (5621). The service address for FGMC is 13901 Midway Road, Ste. 102-334, Dallas, Texas 75244.

| EXHIBIT NO. | DESCRIPTION | OFFERED | OBJECTION | ADMITTED | DATE |
|-------------|--|---------|-----------|----------|------|
| 1. | <i>MOTION to Lift the Stay of Briefing 103 Order, by PIMCO Investments, LLC, Pacific Investment Management Company, LLC. (Attachments: # 1 Brief Memorandum of Law in Support of the PIMCO Defendants' Motion to Lift the Stay of Briefing, # 2 Affidavit Declaration of Peter H. White in Support of the PIMCO Defendants' Motion to Lift the Stay of Briefing) (Qui Tam Dkt. 104).</i> | | | | |
| 2. | <i>MOTION to Compel Insurance Policies, MOTION to Transfer Case to Delaware with Brief In Support by Kari Crutcher. (Attachments: # 1 Exhibit 1 - Notice of Appeal, # 2 Exhibit 2 - RFP Response) (Qui Tam Litigation Dkt. 105). [Note: Relator filed an identical pleading at Qui Tam Dkt. 106 to oppose the PIMCO Parties' Motion to Lift the Stay of Briefing.]</i> | | | | |
| 3. | <i>REPLY BRIEF re 104 MOTION to Lift the Stay of Briefing 103 Order, and In Opposition to Motion to Compel Documents 105 filed by PIMCO Investments, LLC, Pacific Investment Management Company, LLC. (Qui Tam Dkt. 107).</i> | | | | |
| 4. | <i>MOTION for Leave to File motion to dismiss and Third Amended Complaint by Kari Crutcher. (Qui Tam Dkt. 108).</i> | | | | |
| 5. | <i>Proposed Third Amended Complaint (Qui Tam Dkt. 108-1).</i> | | | | |
| 6. | <i>Redline of Third Amended Complaint Against the Operative Complaint (Qui Tam Dkt. 108-2).</i> | | | | |
| 7. | <i>Relator's Proposed Order to the Georgia District Court (Qui Tam Dkt. 108-3).</i> | | | | |
| 8. | <i>NOTICE by PIMCO Investments, LLC, Pacific Investment Management Company, LLC, Andrew Peters re 108 MOTION for Leave to File motion to dismiss and Third Amended Complaint of Consent to Dismissal of This Action (Qui Tam Dkt. 109).</i> | | | | |
| 9. | <i>REPLY BRIEF re 105 MOTION to Compel Insurance Policies MOTION to Transfer Case to Delaware filed by Kari Crutcher. (Qui Tam Dkt. 110).</i> | | | | |

| EXHIBIT NO. | DESCRIPTION | OFFERED | OBJECTION | ADMITTED | DATE |
|--------------------|--|----------------|------------------|-----------------|-------------|
| 10. | <i>RESPONSE in Opposition re 108 MOTION for Leave to File Leave to file motion to dismiss and Third Amended Complaint filed by PIMCO Investments, LLC, Pacific Investment Management Company, LLC. (Qui Tam Dkt. 111).</i> | | | | |
| 11. | <i>Findings of Fact, Conclusions of Law, and Order (I) Approving Disclosures on a Final Basis and (II) Confirming the Amended Combined Disclosure Statement and Chapter 11 Plan of First Guaranty Mortgage Corporation and Debtor Affiliate (D. I. 671)</i> | | | | |
| 12. | <i>Amended, Modified and Restated Combined Disclosure Statement and Chapter 11 Plan of First Guaranty Mortgage Corporation And Debtor Affiliate (D. I. 671-1)</i> | | | | |
| 13. | <i>Notice of (I) Confirmation and Effective Date of the Amended Combined Disclosure Statement and Chapter 11 Plan of First Guaranty Mortgage Corporation and Debtor Affiliate and (II) Deadline Under the Plan and Confirmation Order to File Administrative Claims, Professional Fee Claims, and Rejection Claims (D. I. 678)</i> | | | | |
| 14. | <i>Motion of Pacific Investment Management Company LLC and PIMCO Investments LLC to Enforce the Chapter 11 Plan and Confirmation Order (D. I. 900)</i> | | | | |
| 15. | <i>Order Granting Motion of the PIMCO Parties to Enforce the Chapter 11 Plan and Confirmation Order (D. I. 951)</i> | | | | |
| 16. | <i>Transcript Regarding Hearing Held September 5, 2023 (D. I. 956)</i> | | | | |
| 17. | <i>Certificate of Service of Zachary J. Javorsky re: Order Granting Motion of the PIMCO Parties to Enforce the Chapter 11 Plan and Confirmation Order (D. I. 957)</i> | | | | |

Dated: October 31, 2023

/s/ Robert J. Stearn, Jr.

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